



DUNNING RIEVMAN & MACDONALD LLP  
ATTORNEYS AT LAW

Brian C. Dunning  
bdunning@drmlaw.com  
646-873-7522

December 3, 2024

**VIA ECF FILING**

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square, Courtroom 619  
New York, New York 10007

**Re: *Revlon Consumer Products LLC et al. v. Give Back Beauty S.A., et al.*,  
Civil Action No. 1:24-cv-06438-ER**

---

Dear Judge Ramos:

We are counsel to Defendant Ashley Fass (“Defendant Fass”) in the above-referenced action. In accordance with Individual Rule 1.A, E, we write to respectfully request an extension from December 4, 2024, to December 13, 2024, for Defendant Fass to respond to Plaintiffs’ Complaint, including counterclaims.

We have conferred with Plaintiffs’ counsel and Plaintiffs consent to the requested extension of Defendant Fass’ deadline to respond to the Complaint to December 13, 2024.

The reason for this request is the parties have been negotiating a resolution and are close to a comprehensive settlement. At this time, filing the Answer may frustrate the possible settlement.

The requested extension will not alter any other scheduled dates. The court has previously granted three extensions of time for all Defendants to respond to the Complaint. *See* ECF No. 30, 117, 136.

In light of the above, we respectfully request the Court extend Defendant Fass’ deadline to respond to the Complaint to December 13, 2024.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Brian C. Dunning', written over a light blue circular stamp.

cc: All Counsel of record

Brian C. Dunning